

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
SARAH RAMOS, ANGEL SUAREZ, AND WILLIAM
SUAREZ,

Plaintiffs,

-against-

CITY OF NEW YORK and DETECTIVE JOSE
MARRERO,

Defendants.
----- X

**NOTICE OF APPLICATION
FOR COSTS SOUGHT
AGAINST PLAINTIFFS**

15-CV-6085 (ER)

PLEASE TAKE NOTICE that, upon defendants' Bill of Costs, the Declaration of Senior Counsel Lucienne Pierre dated May 29, 2019, and the exhibits annexed thereto, and all other pleadings and proceedings herein, defendants will move this Court before the Judgment Clerk at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York 10007 on June 14, 3018 at 11:30A.M. or, as soon thereafter, as counsel may be heard at a time and date to be determined as convenient by the Court, for an order pursuant to Rule 54 of the Federal Rules of Civil Procedure, Local Civil Rule 54.1, and 28 U.S.C. §§ 1920 and 1923 granting fees and costs sought by defendants and granting such other relief that this Court deems proper.

Date: New York, New York
May 30, 2019

ZACHARY W. CARTER

Corporation Counsel of the City of New York

Attorney for Defendants

100 Church Street

New York, New York 10007

Tel.: (212) 356-2415

By:



Lucienne Pierre

Senior Counsel

Special Federal Litigation Division

To: VIA ECF

David Bruce Rankin, Esq.
Beldock Levine & Hoffman LLP
99 Park Ave 26th Floor
New York, NY 10016
Tel.: (212) 490-0400
Fax: (212) 277-5880
Email: DRankin@BLHNY.com

Marc Augustine Cannan, Esq.
Beldock Levine & Hoffman LLP
99 Park Avenue
New York, NY 10016
Tel.: (212) 277-5853
Fax: (212) 557-0565
Email: mcannan@blhny.com
Attorneys for Plaintiffs

15-CV-6085 (ER)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH RAMOS, ANGEL SUAREZ, AND
WILLIAM SUAREZ,

Plaintiffs,

-against-

CITY OF NEW YORK and DETECTIVE JOSE
MARRERO,

Defendants.

**NOTICE OF APPLICATION FOR COSTS, BILL
OF COSTS, AND DECLARATION IN SUPPORT
OF DEFENDANTS' APPLICATION FOR COSTS
AGAINST PLAINTIFFS AND ANNEXED
EXHIBITS**

ZACHARY W. CARTER

*Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street
New York, N.Y. 10007*

*Of Counsel: Lucienne Pierre
Tel: (212) 356-2415
NYCLIS No. 2015-039980*

Due and timely service is hereby admitted.

New York, N.Y., 201 ..

..... Esq.

Attorney for